

**REMARKS**

Claims 1, 4, 6 and 9-14 are pending in this application. By this Amendment, claims 1, 4, 6 and 10 are amended and claims 12-14 are added. Support for the amendments to claims 1, 4 and 6 can be found at least at page 7, lines 23-26 of the specification. Claim 10 is amended solely for clarity. Support for the subject matter of new claims 12-14 can be found at least at page 8, lines 7-11 of the specification. Thus, no new matter is added.

Reconsideration based on the above amendments and the following remarks is respectfully requested.

**I. Rejections under 35 U.S.C. §112**

The Office Action rejects claims 1, 4, 6 and 9-11 under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement. By this Amendment, claims 1, 4 and 6 are amended responsive to the rejection. Accordingly, Applicants respectfully request withdrawal of the rejection.

The Office Action also rejects claims 1, 4, 6 and 9-11 under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. By this Amendment, claims 1, 4 and 6 are amended responsive to the rejection. Accordingly, Applicants respectfully request withdrawal of the rejection.

**II. Rejection under 35 U.S.C. §103**

The Office Action rejects claims 1, 4, 6 and 9-11 under 35 U.S.C. §103(a) as being unpatentable over Chen (U.S. Patent No. 6,249,281) in view of Merrill (U.S. Patent No. 6,789,228). Applicants respectfully traverse this rejection.

Specifically, neither Chen or Merrill, alone or in combination, disclose or suggest an image retrieval apparatus having at least a retrieval unit that matches an extracted character string with an input keyword to retrieve relevant static image data, the retrieval unit retrieving

meta-data and voice index data that include the input keyword, as recited in independent claim 1, and similarly recited in independent claims 4 and 6.

To the contrary, Chen discloses a graphical user interface that includes a video region for displaying a video of a presenter giving a presentation. The video region includes both a primary slide region for displaying slides used by the presenter during the presentation and a thumb-nail region containing thumbnails representing slides in the presentation.

The Office Action acknowledges that Chen does not explicitly disclose extracting a character string contained in the static image data by at least one of (1) extracting text data from the static image data which has the text data, and (2) performing character recognition processing on the static image data and extracting text data which is a result of the processing.

Further, Chen also fails to disclose a retrieval unit that matches the extracted character string with the input keyword to retrieve relevant static image data, the retrieval unit retrieving meta-data and voice index data that include the input keyword (*see* pages 6 and 7 of the Office Action).

Contrary to the Office Action's assertion, Merrill fails cures the above-noted deficiencies of Chen. Merrill discloses a system that automatically digitally captures lecture presentation slides and speech and stores the data in a memory (*see* Abstract). In particular, Merrill discloses a front-end interface 900 that has a fourth frame that contains a box in which the user can enter search terms 912, a pop-up menu with which the user can select types of media the user wishes to search, and a button that initiates the search (*see* col. 10, lines 30-50 and Fig. 9). Further, in Fig. 9, Merrill shows that in search box 912, (in the lower right hand corner) below the words "search in" there is a dropdown box which, in this example, the user has selected "audio transcript."

Because the user must select a single type of media in the dropdown box, Merrill cannot reasonably be considered to have suggested that more than a single type of media can

be selected for this search. For instance, based on the pop-up menu/dropdown box described and shown in Fig. 9, there is nothing to suggest that the user may select searching both the text box and the audio transcript.

Thus, neither Chen or Merrill, alone or in combination, disclose or suggest an image retrieval apparatus having at least a retrieval unit that matches an extracted character string with an input keyword to retrieve relevant static image data, the retrieval unit retrieving meta-data and voice index data that include the input keyword, as recited in independent claim 1, and similarly recited in independent claims 4 and 6.

For at least the reasons discussed above, independent claims 1, 4 and 6 remain patentable over the combination of Chen and Merrill. Claim 9 is patentable at least for its dependency from independent claim 1, as well as for the additional features it recites. Claim 10 is patentable at least for its dependency from independent claim 4, as well as for the additional features it recites. Claim 11 is patentable at least for its dependency from independent claim 6, as well as for the additional features it recites. Accordingly, Applicants respectfully request withdrawal of the rejection.

### **III. New Claims 12-14 Define Patentable Subject Matter**


For at least the reasons discussed above, independent claims 1, 4 and 6 remain patentable over the combination of references. Claim 12 is patentable at least for its dependency from independent claim 1, as well as for the additional features it recites. Claim 13 is patentable at least for its dependency from independent claim 4, as well as for the additional features it recites. Claim 14 is patentable at least for its dependency from independent claim 6, as well as for the additional features it recites.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

  
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Attachment:

Request for Continued Examination

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